

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CIMC RAFFLES OFFSHORE (SINGAPORE) PTE.
LTD. AND YANTAI CIMC RAFFLES
OFFSHORE LIMITED,

Petitioners,

v.

SCHAHIN HOLDING S.A., SCHAHIN
ENGENHARIA S.A., SEA BISCUIT
INTERNATIONAL INC., BLACK GOLD
DRILLING LLC, BAERFIELD DRILLING LLC
and SORATU DRILLING LLC,

Respondents.

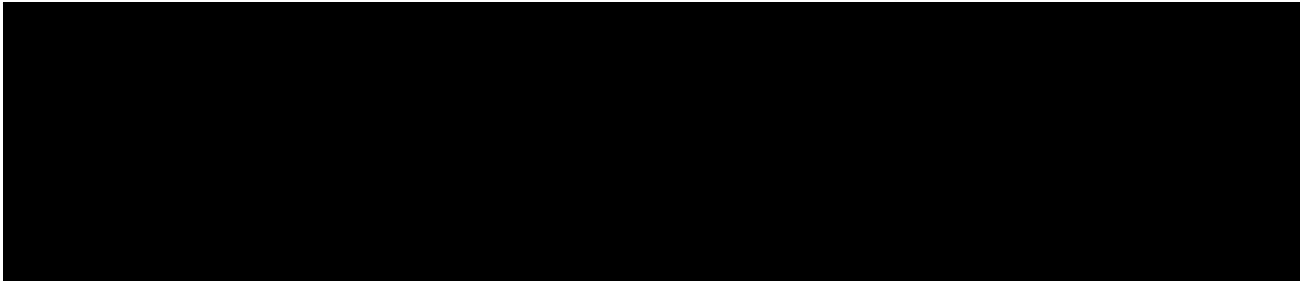
13 Civ. 0052 (JSR)

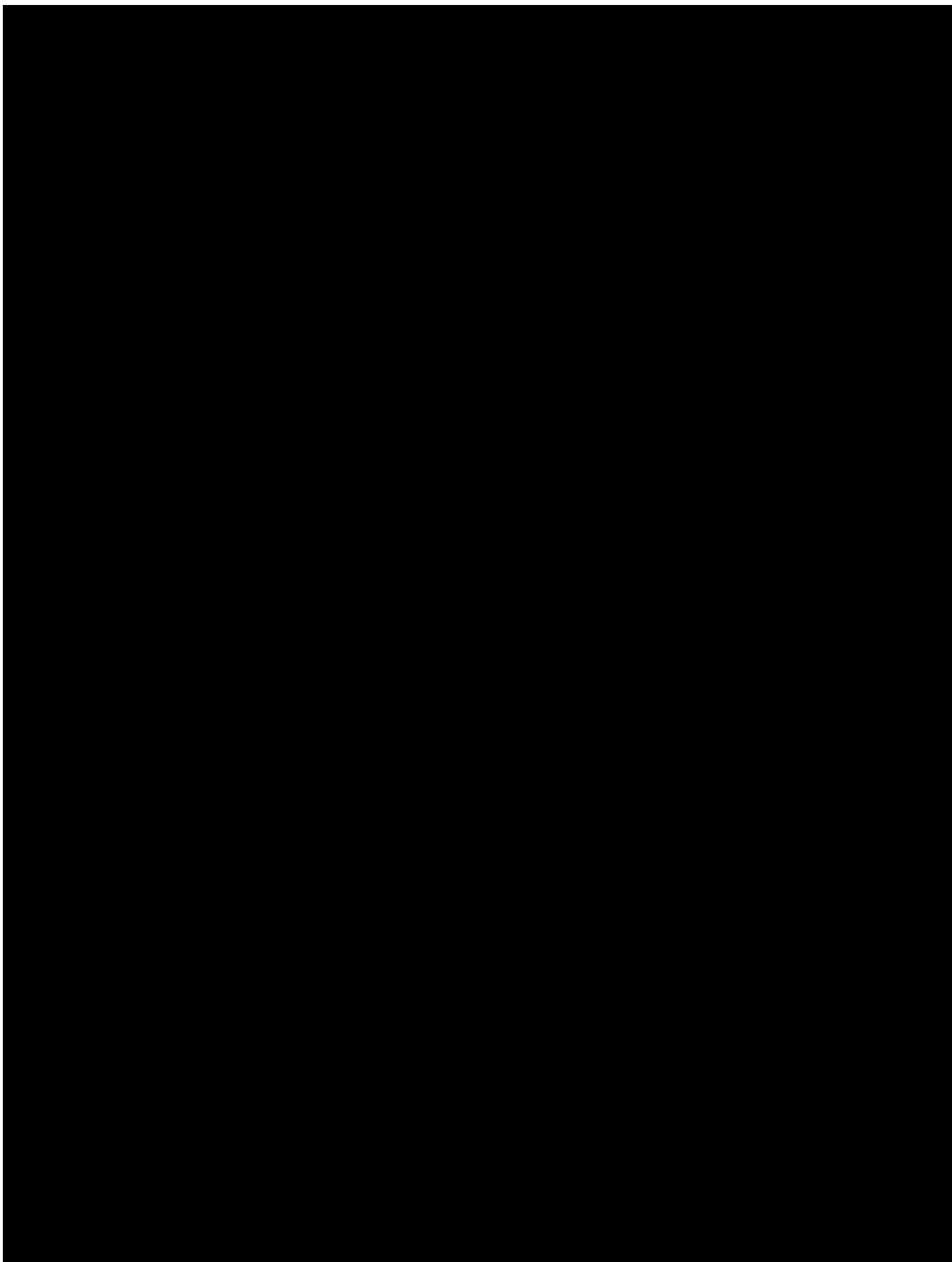
DECLARATION OF PAUL S. HESSLER

I, Paul S. Hessler, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, pursuant 28 U.S.C. § 1746:

1. I am a Partner with the law firm Linklaters LLP, counsel to Respondents Schahin Engenharia S.A., Black Gold Drilling LLC, Baerfield Drilling LLC and Soratu Drilling LLC (together, "Respondents") in this proceeding.

2. I respectfully submit this affidavit in connection with the Respondents' Motion to Stay Enforcement.





11. Attached hereto at Exhibit 1 is a true and correct copy of the Declaration of Fernando Schahin.

12. Attached hereto at Exhibit 2 is a true and correct copy of the Declaration of José Isaias Hoffmann.

Dated: New York, New York
August 27, 2013

Respectfully submitted,

Linklaters LLP

By: 

Paul S. Hessler
1345 Avenue of the Americas,
New York, NY 10105
(212) 903-9000
(212) 903-9100 (fax)
Email: paul.hessler@linklaters.com

*Attorney for Respondents Black Gold Drilling
LLC, Baerfield Drilling LLC, Soratu Drilling
LLC, and Schahin Engenharia S.A.*